

## **1.0 PURPOSE AND NEED FOR THE PROPOSED ACTION**

### **1.1 INTRODUCTION**

The Los Angeles Field Office of the Federal Bureau of Investigation (FBI) has investigative jurisdiction over the Federal Central District of California, which is comprised of seven counties: Los Angeles, Orange, Riverside, San Bernardino, San Luis Obispo, Santa Barbara, and Ventura. This territory is the most populated and covers the greatest geographic area in the entire FBI. Over 18 million people reside within the 40,000 square miles of the seven counties.

The Los Angeles Field Office has the third greatest number of Special Agents assigned to a region in the FBI. Organizationally, the Los Angeles Field Office Headquarters is located at 11000 Wilshire Boulevard in Los Angeles. In support of the Los Angeles Field Office Headquarters, there are ten satellite offices known as Resident Agencies, which are located in Lancaster, Long Beach, Palm Springs, Riverside, Santa Ana, Santa Maria, Ventura, Victorville, West Covina, and at the Los Angeles International Airport.

The population for the seven-county region for the Los Angeles FBI area of responsibility has increased from 15,000,000 to 18,000,000 from 1990 to 2004 according to the U.S. Census Bureau, for an average growth rate of over 210,000 people per year. Los Angeles County is the second largest population center in the United States, and in the last decade, grew by an average of 65,000 persons per year to approximately 9,937,000 people in 2003. This population growth has had an impact on the caseload of the Los Angeles FBI. In addition, since September 11, 2001 workload and operations for the FBI Los Angeles Field Office Headquarters have increased in response to coordinating regional task forces.

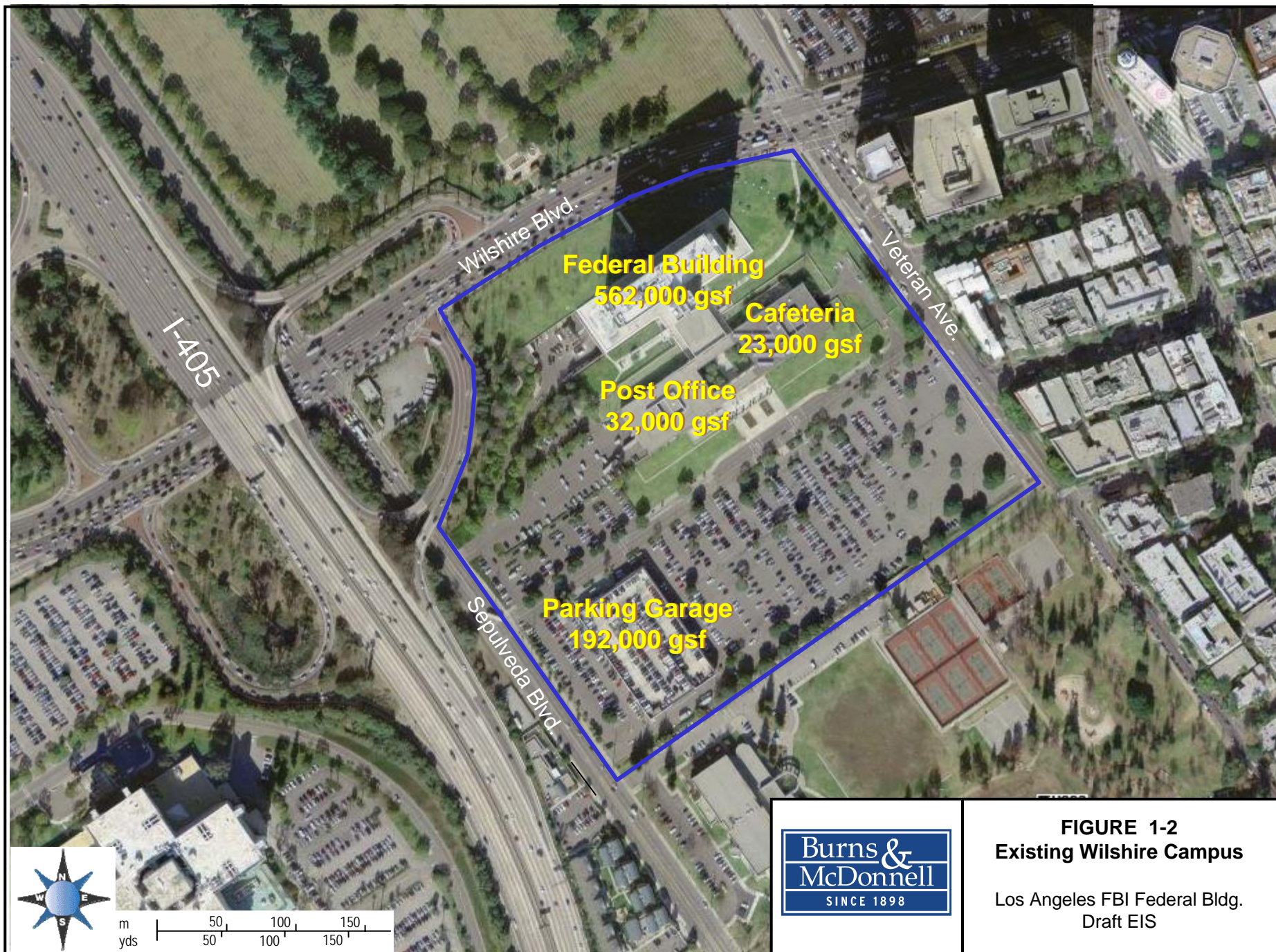
#### **1.1.1 FBI Los Angeles Field Office Headquarters Facilities**

The FBI Los Angeles Field Office Headquarters is located in the Federal Building at 11000 Wilshire Boulevard (Figure 1-1). Personnel assigned to the Field Office Headquarters are located at 11000 Wilshire Boulevard and various off-site leased facilities. Currently, the FBI Los Angeles Field Office Headquarters occupies approximately 295,000 gross square feet (GSF) of office space out of a total of approximately 562,000 GSF space available at the 11000 Wilshire Boulevard office building. The FBI has been at this location for over 35 years. In addition, the FBI leases approximately 132,000 square feet of building space at 11 leased locations at distances of 5 to 30 miles away to house functions that would otherwise be located at the FBI Field Office Headquarters building at 11000 Wilshire Boulevard.

The existing 28-acre Federal office campus at 11000 Wilshire Boulevard (Figure 1-2) contains approximately 809,000 gross square feet (GSF) of building space, including the 17-floor office building (562,000 GSF) (Photograph 1-1), the FBI parking structure with 440 parking spaces and an automotive/radio maintenance facility(A/RMF) (192,000 GSF), the cafeteria (23,000 GSF), the post office (32,000 GSF), and surface parking spaces (Photograph 1-2) for approximately 1,451 visitor and government vehicles, including a loading dock area. Normally, there are approximately 1,252 employees on site consisting of FBI, other Federal agency employees, U.S. Post Office employees and cafeteria workers. The Los Angeles FBI Field Office Headquarters employee population is 1,291, of which approximately 700 are full-time FBI employees at the 11000 Wilshire Boulevard office tower and A/RMF, 82 contract employees, 293 task force members and 216 employees at the 11 leased facilities.







**FIGURE 1-2**  
**Existing Wilshire Campus**  
Los Angeles FBI Federal Bldg.  
Draft EIS



**Photograph 1-1  
11000 WILSHIRE OFFICE TOWER**



**Photograph 1-2  
11000 WILSHIRE SITE PARKING**



The 11000 Wilshire Boulevard office building was constructed in the late 1960s and is in need of major repairs. Estimates for all the necessary repairs and modifications to bring the building up to current standards range from \$185-200 million dollars. The repairs and modifications include seismic retrofit, asbestos removal, replacement of drinking water lines, improved ventilation systems, and more.

## **1.2 PURPOSE OF THE PROPOSED ACTION**

The purpose of the proposed project is twofold: (1) consolidate the FBI Field Office Headquarters and 11 other separate leased locations that support the Field Office Headquarters into one single location; and (2) provide for a permanent Field Office Headquarters which will accommodate the future projected growth of the FBI.

The U.S. General Services Administration (GSA) proposes to consolidate the FBI Field Office Headquarters operations by constructing new Federal buildings which will have approximately 700,000 GSF of office space, 190,000 GSF of storage space, 47,000 GSF for an automotive/radio maintenance facility (A/RMF) and 420,000 GSF for 1,200 secured garage parking spaces. In addition there will be 750 secure parking spaces on surface lots. A helicopter landing pad will be included on the top of the new office buildings for emergency use.

This project has received design funding for the first phase that will include 230,000 GSF for office space, 190,000 GSF for storage space, 47,000 GSF for the A/RMF and 297,500 GSF for the secure parking garage. The second phase will satisfy the long-term facilities requirements with 470,000 GSF for office space and the 122,500 GSF second section for the secure parking garage. A site to accommodate the phase one and phase two buildings plus the parking garage with the necessary clear areas for security requirements will require a minimum of 10 acres.

## **1.3 NEED FOR THE PROPOSED ACTION**

The FBI mission includes a wide variety of law enforcement activities. These include investigating actions involving all of the following:

- Counterterrorism
- Counterintelligence
- Cybercrimes
- Public Corruption
- Civil Rights
- Organized Crime
- White-Collar Crime
- Violent Crime/Major Thefts

These FBI activities regularly require coordination with other agencies and interested parties. The requirement for coordination activities has increased substantially since September 11, 2001. Coordination and investigations require, in some cases, the participation of representatives from over 45 Federal, state, and local agencies. Oftentimes these participants are collocated at one facility in order to maximize their interaction and effectiveness.

Personnel assigned to the Field Office Headquarters are divided between 11000 Wilshire Boulevard and 11 leased facilities ranging in size from just over 300 to over 32,000 square feet. There are 216 staff assigned to these 11 leased facilities located from 5 to 30 miles away from 11000 Wilshire Boulevard (Table 1-1). This separation of staff among several geographically isolated buildings adversely impacts FBI daily operations and its ability to address its caseload in a timely and safe manner, since personnel must routinely expend substantial work hours to travel between the leased spaces and the 11000 Wilshire

Boulevard location. The FBI needs to consolidate its Field Office Headquarters operations to increase its efficiency and effectiveness.

**Table 1-1  
FBI LEASED SPACES**

Location	Square Feet (Rentable)
1	23,850
2	9,600
3	329
4	5,569
5	13,511
6	13,308
7	2,997
8	2,835
9	13,800
10	13,800
11	32,326
<b>Total</b>	<b>131,925</b>

### 1.3.1 Functional Building Needs

**Security.** While the current location of the FBI Field Office Headquarters in the 11000 Wilshire Boulevard building meets the required security setback distance from the edge of the property, not all the current FBI leased facilities meet the setback requirements. Currently, the FBI Field Office Headquarters and some of off-site leased spaces are located in multi-tenant buildings. Current FBI security requirements dictate that the FBI facilities be located in buildings that are only occupied by the FBI.

**Spatial Needs.** In order to efficiently satisfy FBI mission requirements, the following elements are minimum requirements for FBI occupied spaces.

One critical element is the requirement for usable floor space per floor of a minimum of 30,000 to 40,000 gross square feet to allow the various FBI teams and Joint Terrorism Task Force (JTTF) members to operate efficiently and effectively for daily operations and in response to emergencies. The existing 11000 Wilshire building single floor plate maximum is only 21,000 square feet and therefore, inadequate for these needs.

Another element requires that the columns on each floor need to be spaced at least 30 feet on center. This clearance is required in order for the team members who are organized into working groups, to be configured in modular office spaces that fit between columns that are 30 feet apart. The existing 11000 Wilshire building has column spacing at only 23 feet and therefore, inadequate for the FBI needs.

A third requirement is for approximately 190,000 square feet of storage space with a floor load capacity of 200 pounds per square foot. This space will be for evidence storage that will use efficient, modern storage systems that stack together, hence the higher than standard floor load requirements. At the existing 11000 Wilshire building, there is only approximately 40,000 square feet of space with the 200

pounds per square foot capacity. Currently, evidence that cannot be stored at 11000 Wilshire is stored at an off-site leased location. This creates problems and inefficiencies for the FBI in terms of the lack of ready access to evidence stored at a remote location, the reduction in productive time for personnel that have to travel between the 11000 Wilshire site and the leased site, and the storage of evidence in a leased facility that does not meet current FBI security requirements.

The current FBI requirements noted above cannot be reasonably satisfied in the 11000 Wilshire Boulevard Federal Building as it is currently configured and the building can not be effectively modified to meet these requirements.

**Staff Forecasts.** The FBI forecasts a two percent per year increase in staff at its FBI Field Office Headquarters between 2003 and 2017. That is, the number of FBI employees and task force members assigned to the FBI Field Office Headquarters is expected to grow from approximately 1,291 to 1,640. By 2017, the FBI Field Office Headquarters will need 700,000 GSF of office space, 190,000 GSF of evidence storage and ancillary facilities, 47,000 GSF for an automotive/radio maintenance facility and a secure parking garage of approximately 420,000 GSF with enough secured parking spaces for 1,200 government and employee vehicles in a parking structure, and 750 secure parking spaces on a surface lot.

### 1.3.2 Location Needs

The FBI has reviewed its current and projected operational needs for the region and the location of its regional field offices. Based on the FBI's analysis, the delineated area for the location of the FBI Field Office Headquarters needs to be within the boundaries of I-405 on the west, I-10 on the south, I-5 on the east and Magnolia Boulevard on the north (Figure 1-3). The FBI Resident Agencies will remain throughout the Los Angeles area at their current locations in order to support the FBI's mission.

In order to satisfy the security and mission needs of the FBI, a potential site must be within the delineated area noted above and meet the following minimum requirements. First, the site must have a minimum of 10 acres of land. Second, any site needs to be at least one mile away from other major Federal, state, and local law enforcement headquarter facilities to avoid damage to collocated facilities under catastrophic conditions from a natural disaster or terrorist activity. Third, in order to maximize emergency response times, the site must provide access to major freeways via main routes. Fourth, railroad tracks can not border or cross the site, to prevent their use for terrorist incursions.

Other requirements include location in an area zoned or suitable for office development which allows building heights up to 140 feet. In addition, sites should not be located in a floodplain or airport flight paths. All potential sites must have clear titles and be immediately available for construction.

## 1.4 LEAD AGENCY, AFFECTED AGENCIES, AND AUTHORIZING ACTIONS

GSA, Region 9, is the lead agency with respect to implementing the requirements for the National Environmental Policy Act (NEPA) for this action, and therefore, has the primary responsibility to prepare this environmental impact statement (EIS).

The approval of discretionary permits by various Federal, state, regional and local agencies for the proposed project will be based in large part on the information contained within this EIS. However, additional information may be required by these agencies before permits are granted.





#### **1.4.1 Environmental Protection Agency (EPA)**

The Environmental Protection Agency (EPA) is authorized by Section 309 of the Clean Air Act (CAA) to review and comment on any matter subject to NEPA. The EPA has jurisdiction over environmental impacts associated with Federal actions and, if any matter in this action is unsatisfactory with regards to public health, welfare, or environmental quality issues, EPA may refer these matters to the Council on Environmental Quality (CEQ).

The CAA recognizes that increases in air pollution result in danger to public health and welfare. To protect and enhance the quality of the Nation's air resources, the CAA authorizes the EPA to set National Ambient Air Quality Standards (NAAQSs), which regulate carbon monoxide, lead, nitrogen dioxide, ozone, sulfur dioxide, and particulate matter pollution emissions, among others. The South Coast Air Quality Management District (SCAQMD) is the regional government agency that regulates sources of air pollution in Southern California, including Los Angeles. The SCAQMD has the responsibility for improving the air quality within its jurisdiction in order to comply with Federal and state air quality standards.

#### **1.4.2 Advisory Council on Historic Preservation**

As stated in the National Historic Preservation Act (NHPA), it is the policy of the Federal government to foster conditions where modern society can coexist with prehistoric and historic resources. The NHPA established the Advisory Council on Historic Preservation (Council) which advises the President, Congress, and Federal agencies on historic preservation issues. The Council is responsible for implementing Section 106 of the NHPA, which requires that agencies consider the effects of their undertakings on "historic properties," defined as districts, sites, buildings, structures, and objects included in or eligible for inclusion in the National Register of Historic Places (NRHP).

Federal laws and regulations, including the NHPA (42 U.S.C. § 4332), the Archeological Resource Protection Act (16 U.S.C. § 470aa), the Native American Graves Protection and Repatriation Act (25 U.S.C. § 3001), and the American Indian Religious Freedom Act (42 U.S.C. § 1996) identify the regulatory requirements and responsibilities concerning cultural resources. These include the need to provide an inventory of resources that are potentially eligible for the NRHP and to consider impacts Federal projects may have on those resources. In addressing impacts, an agency may elect to avoid impacting a resource or mitigate adverse impacts through measures such as data recovery.

Under NHPA, impact assessment involves identifying activities that could directly or indirectly affect significant resources, identifying known or expected significant resources in the area of potential effects, and determining the potential level of impacts on the resources. Both the NHPA and NEPA processes involve consideration of the project alternatives' likely impacts to cultural resources. Under NEPA, impacts to historic or cultural resources are explicitly identified as attributes that must be addressed in order to measure the significance of a project's potential environmental effect. Consideration of the potential for effects and adverse effects to cultural resources is included in the current NEPA assessment. However, an adverse effect on a historic property does not necessarily equate to a significant impact under NEPA.

#### **1.4.3 Fish and Wildlife Service**

The Endangered Species Act (ESA) of 1973 established a Federal program to conserve, protect, and restore threatened and endangered plants and animals and their critical habitats. The ESA specifically charges Federal agencies with the responsibility of using their authority to conserve threatened and endangered species.

The Fish and Wildlife Coordination Act (FWCA) provides the basic authority for the U.S. Fish and Wildlife Service's involvement in water resource development projects. It requires that fish and wildlife resources receive equal consideration to other project features.

## **1.5 NEPA RELEVANCE TO FEDERAL REGULATIONS AND EXECUTIVE ORDERS**

Many Federal agencies are required to comply with procedures mandated by statutes other than NEPA. The CEQ states that when an agency must comply with the environmental procedures of other statutes, compliance with these regulations should be incorporated into the NEPA process (40 CFR, Part 1502.25). Although the procedures may be integrated, the overall statutory requirements remain independent.

GSA has adopted Order PBS P 1095.4B, Preparation of Environmental Assessments and Environmental Impact Statements, which requires the inclusion of applicable environmental statutes into the NEPA planning process. These laws, regulations, and executive orders are identified and discussed within the appropriate EIS issue areas.

## **1.6 SCOPING PROCESS**

The public involvement and review process is mandated by NEPA and CEQ regulations. Inviting the public to participate in this process is called "scoping". The CEQ regulations state repetitively that scoping is a key tool to help eliminate unimportant issues and to learn from the public which issues may be the most important for analysis. In addition, scoping is used to determine the kinds of expertise, analyses, and consultations likely to be needed. The extent of public participation typically depends on the magnitude of the environmental consequences associated with a proposed action and public interest in its outcome.

The scoping process for this EIS began when letters were sent to Federal, state, local and private agencies describing the proposed action and inviting comments and concerns. In addition, a public Notice of Intent (NOI) to prepare an EIS was published in the Federal Register and in the Los Angeles Times on April 25, 2004 to solicit comments from public agencies and interested parties. The NOI invited interested parties to a scoping meeting held in West Los Angeles in the Federal Cafeteria Building at 11000 Wilshire Boulevard, from 4:30 PM to 7:30 PM on May 20, 2004. Approximately 60 individuals attended the meeting, which was hosted by representatives from GSA, Burns & McDonnell, Katz Okitsu & Associates and the FBI. A court reporter was present and a transcript of the meeting was prepared.

A list of individuals and agencies that provided scoping comments on this project is included in Appendix A. The comments that were received are summarized below.

### **Scoping Comments**

Twenty-two people offered comments on the proposed project at the meeting. As a result of this initial meeting, GSA extended the scoping process to include an outreach program for surrounding neighborhood groups which were primarily concerned about the potential of the proposed facilities to increase local traffic congestion. A series of roundtable meetings were held in January 2005, resulting in the formation of a Traffic Working Group. Three Traffic Working Group meetings were held between May and September 2005. The key issues expressed during the extended scoping process include the following:

#### **General**

- The need for an extension of scoping comment period by 30 days to June 25, 2004

Traffic

- The potential for increased traffic congestion
- The need to include peak traffic characteristics in the analysis of the impacts of future occupancy numbers
- The need to study regional traffic impacts and potential “spill-over” traffic on to neighborhood streets
- The need for a comprehensive review of employee commuting patterns, including an origin-destination study for employees on site, employee field trips and court appointments
- The need to identify mitigation measures for traffic impacts
- Concerns regarding limited mass transit service in area
- The need to consider notifying the cities of Beverly Hills and Santa Monica to solicit their comments on the project, specifically regarding traffic concerns
- The need to consider California Department of Transportation (CALTRANS) pending closure of the I-405 interchanges at Montana Avenue and Moraga Drive, which will shift more traffic onto Wilshire Boulevard
- The need to evaluate the probable increase in personnel costs resulting from potential traffic delays
- The need to consider circulation and mobility impacts caused by political demonstrations and their attendant added security requirements

Planning

- The need to consider direct and cumulative impacts of “in review” or recently approved project proposals in the area
- The need to consider the impacts of the proposed project on the University of California, Los Angeles (UCLA) Long Range Development Plan
- The need to include the proposed development of Century City in the traffic study
- The need to consider the impact from proposed Veterans Administration development
- The need to consider the impacts of the proposed project on the Westwood Community Plan
- The need to address the existing inadequate transition between commercial and industrial uses and single- and multi-family residential areas
- The need to address properties zoned for high density commercial and high medium density residential located on the east side of property
- The need for the design to achieve a high level of quality, distinctive character and compatibility with adjacent development in terms of community character and scale
- The need to consider the proposed project as an adjacent land use of Westwood and address policies of the Westwood Community Plan
- The need to evaluate mitigation measures for potential aesthetic impacts and submit the proposed design to the Westwood Design Review Board
- The need to consider utilizing a Mediterranean [building] style that would be appropriate to southern California
- The need to address and specifically cite the appropriate Southern California Association of Governments (SCAG) policies in comparison of the proposed project to the applicable general plans and regional plans
- The need to address and use SCAG regional growth forecasts for population, household and employment
- The need to address the Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide (RCPG), which reflects the most current SCAG population, household, and employment forecasts for the City of Los Angeles subregion and the City of Los Angeles
- The need to address GMC policies related to the RCPG goal to improve the regional standard of living and to improve the regional quality of life



- The need to address GMC policies related to the RCPG goal to provide social, political, and cultural equity
- The need to address the goals of the Regional Transportation Plan (RTP), the Air Quality Chapter, and the Water Quality Chapter
- The need to implement and monitor all feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project
- The need to consider the potential of building partially or entirely underground

#### Land Use

- The need to consider the potential impacts on the Westwood Community Park including visual, noise, parking, and lighting impacts on the park (during construction and post construction)
- The need to consider potential decreased open space and recreational facilities
- The need to consider the potential decrease in quality of life and property values
- The need to consider the limited space available on the proposed site for future expansion

#### Infrastructure and Services

- The need to consider impacts on emergency response times in the West Los Angeles area
- The need to consider potential impacts on future streetscape improvements
- The need to consider impacts on veterans' ability to receive healthcare and various treatments
- The need to consider the limited food service business (or retail space) available to accommodate new employees in the area
- The need to address the street excavations necessary for expansion of waste, water, power, and communication lines
- The need to address impacts on the potential development of community serving facilities and infrastructure improvements

#### Parking

- The need to address the adequacy of proposed parking designs and the improvement of the safety and aesthetics of parking areas
- The need to consider designing parking to meet the City of Los Angeles parking standards for office buildings

#### Environmental

- The need to consider air quality concerns
- The need to consider the increased noise and disruption from construction and occupancy
- The need to control dust accompanying the construction and excavation activities
- The need to consider noise and safety concerns from helicopters, if there is a pad site planned
- The need to encourage water reclamation, where cost-effective, feasible, and appropriate and any increase in the use of wastewater

#### Security

- The need to address special security concerns, including the potential increased threat of becoming a centralized target for terrorism
- The need to consider the potential impacts of future public demonstrations at the Federal campus

#### Alternative Analysis

- The need to consider a downtown location instead
- The need to address the adequacy of alternatives
- The need to include a project alternative that remodels the existing space to better suit the FBI's requirements
- The need to evaluate the use of the Veterans Administration property for the development

- The need to address the concern that the location would be inefficient by placing the FBI on the western-most edge rather than in the center of the region served
- The need to include both Phase I and II of the development in the EIS analysis

## 1.7 ENVIRONMENTAL IMPACT STATEMENT OVERVIEW

In accordance with CEQ regulations based on the requirements of NEPA, this EIS will be prepared according to the following outline:

1. Purpose and Need for Action

This section identifies the underlying purpose and need to which GSA is responding.

2. Proposed Action and Alternatives

This section describes the GSA's Proposed Action and Alternatives considered feasible. A review of alternatives considered but not feasible is included.

3. Affected Environment

This section describes the environment of the project area to be affected by the Proposed Action and Alternatives evaluated.

4. Environmental Consequences

This section describes the environmental impacts of the Proposed Action and Alternatives.

5. List of Preparers

This section identifies the interdisciplinary approach that was used during this project.

6. References, Agencies, Organizations, and Individuals Consulted

7. Agencies, Organizations, and Individuals to Whom the DEIS Has Been Sent

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